

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

DECLARATION OF ALEXANDRA A.E. SHAPIRO

I, Alexandra A.E. Shapiro, declare as follows:

1. I am a partner at Shapiro Arato Bach LLP, counsel for Sean Combs. I am licensed and in good standing to practice law in the State of New York and I am admitted to the United States District Court for the Southern District of New York.

2. This declaration is based on my personal knowledge of the facts stated herein, and is submitted in support of Mr. Combs's Motion to Preclude the Testimony of Dr. Dawn Hughes.

3. Attached hereto as **Exhibit 1** is the government's disclosure as to expert witness Dr. Dawn Hughes.

4. Attached hereto as **Exhibit 2** is Mr. Combs's disclosure as to expert witness Dr. Alexander Sasha Bardey.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 2, 2025
New York, NY

/s/ Alexandra A.E. Shapiro
Alexandra A.E. Shapiro, Esq.